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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

**CASCADIA WILDALNDS, OREGON
WILD, UMPQUA WATERSHEDS,**

Plaintiffs,

v.

**U.S. BUREAU OF
LAND MANAGEMENT,**

Defendant

and

**AMERICAN FOREST RESOURCE
COUNCIL; ASSOCIATION OF O&C
COUNTIES,**

Defendant-Intervenors.

Case No. 6:24-cv-01641-MTK

JOINT STATUS REPORT

Counsel for Defendants, Plaintiffs, and Intervenors have conferred regarding the completion and/or supplementation of the administrative record (AR) in this case and attempted to resolve record issues to the extent practical at this juncture. Specifically, all parties stipulate as follows:

1. All parties agree to brief their case in chief by motion for summary judgment consistent with the timeline set forth in this Court's Scheduling Order (Dkt. 18).
2. Parties have worked in good faith to timely resolve record issues which will result in the production of a supplemental record to be lodged by BLM in the near future. To the extent BLM is not able to file the record before Plaintiffs file their motion for summary judgment, the parties agree that Plaintiffs may refer to the supplemental record documents by attaching them to their brief.
3. To the extent parties were unable to agree about the introduction of some records, Plaintiffs will file a motion to supplement and/or complete the record contemporaneously with their summary judgment briefing consistent with the timeline outlined by the Court in its Scheduling Order. (Dkt. 18).
4. Defendants will respond to any such record dispute motions by response contemporaneously and consistent with the timeline provided by the Court for Defendants response/cross-motion for summary judgment (rather than within 14 days as typically required for responding to an opposing parties' motion).
5. Plaintiffs will similarly reply to both their motion for summary judgment/response to Defendant's cross-motion for summary judgment as well as reply and/or respond to outstanding record motions consistent with the timeline provided by the Court for its reply/cross-response to Defendant's motion for summary judgment as outlined in the Scheduling Order. (Dkt. 18).

6. Put simply, all parties have agreed to address record motions/disputes contemporaneously with the summary judgment briefing deadlines that have been provided by the Court in its Scheduling Order. See Dkt. 18.
7. Parties will be prepared to address record issues at oral argument if outstanding issues warrant further attention, argument by the parties, or clarification for the Court.

Respectfully submitted.

April 10, 2025

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